



CERTIFIED MAIL

#157110

#157113

September 24, 1982

Refer to: LPC #11501528 - Macon County
Decatur/Borg Warner-York

Borg Warner Corporation
York Automotive Division
625 South Side Drive
Decatur, Illinois 62525

ATTN: Plant Manager

Borg Warner Corporation
York Automotive Division
625 South Side Drive
Decatur, Illinois 62525

ATTN: Mr. Robert Lane

Gentlemen:

On September 9, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of your facility. The purpose of the inspection was to determine your facility's compliance with the Illinois Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111½, §§1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection, the following apparent violations were observed:

... The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief



summary of the capabilities of each item on the list. In facilities where evacuation could be necessary, a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to Subpart D of the 35 Illinois Administrative Code (35 IL. A. C.) 725. You are in apparent violation of Subpart D of the 35 IL. A. C. 725 for the following reasons: Your Spill Prevention, Control, and Countermeasures (SPCC) Plan has not been amended to incorporate hazardous waste management provisions that are sufficient to comply with the applicable requirements of Sections 725.151 and 725.152.

... Requirements contained in the 35 IL. A. C. 725.153 were not complied with in that copies of the contingency plan were not submitted to local emergency response organizations.

... Pursuant to the 35 IL. A. C. 725.116, the owner/operator is required to establish and maintain records relating to the training of personnel involved in hazardous waste management, including a description of the job title for each position at the site, a written job description, a description of training and records detailing the training given to each such individual. You are in apparent violation of the 35 IL. A. C. 725.116 for the following reasons: Such records have not been established or maintained.

... Pursuant to Subpart B of the 35 IL. A. C. 722, a generator who transports or offers for transportation hazardous waste must prepare a manifest prior to shipping the waste off-site. The manifest must contain a manifest document number, the name, mailing address, telephone number and EPA ID number of the generator, the name and EPA ID number of the transporter, and the name, address and EPA ID number of the designated permitted facility. The manifest must also contain a description of the waste including DOT shipping name, DOT hazardous

Borg Warner Corporation
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class and DOT identification number. The quantity of waste and the type and number of containers, the certification, and signatures is also required. At the time of the inspection, the DOT hazard class had not been included on manifests that accompanied prior shipments of hazardous waste. For your information, the DOT hazard class for trichloroethylene is ORM-A.

You are hereby requested to submit to this Agency, within fifteen (15) days of receipt of this letter, a description of steps taken to correct the apparent violations described in this letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact David C. Jansen of my staff at the above number.

Sincerely,



Monte M. Nienkerk
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

MMN/DCJ/cp

Enclosure

cc: DLPC/Division File
DLPC/FOS, Central Region

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C O 5 5 C
(1) (8) (9)

155

ILD 079152518

OBSERVATION REPORT - SITE INVENTORY NO. 11501528
(11) (18)MACON

CO. - L.P.C.

Region # CDate 09/09/82
(20) (25)DECATURBOIG WARNER - YORKLetter Sent (Yes or No) Yes
(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No (X)

Time: From 11:15 AMWeather 80° SUNNY

Ground Water () Surface () Other ()

To 01:15 PM

Photos Taken: Yes () No (X)

Interviewed ROBERT CANEInspector D C J
(27) GDS (29)

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit (X)

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) () NA
(31)

IMPROVED

LPC 4 1/79 5,000

SAME

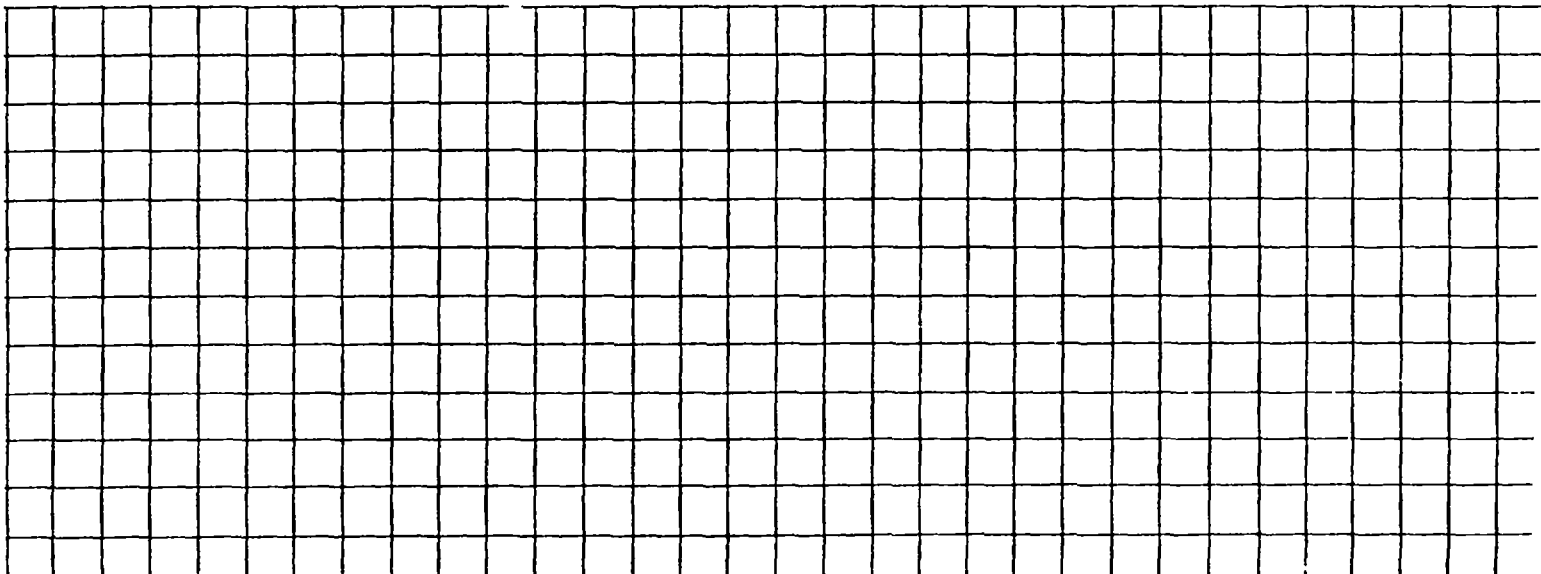
DETERIORATED

I(S) or D S
(62)

GENERAL REMARKS: This facility builds automobile air conditioning compressors. Vapor degreasers utilizing trichloroethylene are used to clean metal parts. Spent trichloroethylene is shipped to a recycling facility. Spent trichloroethylene is being generated at a rate greater than 1000 kg/month. The trichloroethylene is not stored for more than 90 days.

INTERVIEW:

DIAGRAM:



RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)
35 Illinois Administrative Code (35 IL. A. C.) Part 722

1. General Information:*

(A) Installation Name: Borg Warner Corp.-York Automotive Division
(B) Street: 625 South Side Drive
(C) City: Decatur (D) State: IL. (E) Zip Code: 62525
(F) Phone: 217/428-4641 (G) County: Macon
(H) Date of Inspection: 9/9/82 Time of Inspection (From) 11:15A. (To) 1:15P.
(I) Weather Conditions: N/A

(J) Person(s) interviewed	Title	Telephone
Robert Lane	Plant Engineer	217/428-4641

(K) Inspection Participants	Agency/Title	Telephone
<u>David C. Jansen</u>	<u>I.E.P.A./EPS II</u>	<u>217/786-6892</u>
<u>Glenn D. Savage</u>	<u>I.E.P.A./EPS III</u>	<u>217/786-6892</u>

(L) Preparer Information

Name	Agency/Title	Telephone
David C. Jansen	I.E.P.A./EPS II	217/786-6892

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

This facility builds automobile air conditioning compressors. Vapor degreasers utilizing trichloroethylene are used to clean metal parts. Spent trichloroethylene is shipped to a solvent recycling facility (Supplemental Permits #994428 and #995158). In 1982 to date, 2,530 gallons of spent trichloroethylene has been generated. At about 12 lbs. per gallon, 30,360 lbs. have been generated. This rate of generation (greater than 1,000 kilograms per month) qualifies this facility as a hazardous waste generator.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	___	___	_____
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	___	___	_____
2. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>	___	___	_____
3. Name and EPA ID Number of transporter(s)?	<u>X</u>	___	___	_____
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>	___	___	_____

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u> </u>	<u> X </u>	<u> </u>	DOT hazard class needs to be included on manifests (hazard class is ORM-A)
6. The total quantity of waste(s) and the type and number of containers loaded?	<u> X </u>	<u> </u>	<u> </u>	
7. Required certification?	<u> X </u>	<u> </u>	<u> </u>	
8. Required signatures?	<u> X </u>	<u> </u>	<u> </u>	
(C) Does the owner or operator submit exception reports when needed?	<u> </u>	<u> </u>	<u> </u>	None needed to date

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<u> X </u>	<u> </u>	<u> </u>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<u> X </u>	<u> </u>	<u> </u>	
(C) If required, are placards available to transporter?	<u> X </u>	<u> </u>	<u> </u>	
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	<u> X </u>	<u> </u>	<u> </u>	Containers are stored in building south of main plant
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u> X </u>	<u> </u>	<u> </u>	

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
c. Do continuous feed systems have a waste-feed cutoff?	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
d. Are required daily and weekly inspections done?	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (35 IL. A. C. 725.117 (b))	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	<u> </u>	<u> </u>	<u> </u>	<u>DOES NOT APPLY</u>

*Not Inspected

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

YES NO NI* Remarks

A. Do Personnel training records include: (Effective 5/19/81)

- | | | | | |
|---|-------|----------|-------|--------------------------------------|
| 1. Job Titles? | _____ | <u>X</u> | _____ | <u>No personnel training record:</u> |
| 2. Job Descriptions? | _____ | <u>X</u> | _____ | _____ |
| 3. Description of training? | _____ | <u>X</u> | _____ | _____ |
| 4. Records of training? | _____ | <u>X</u> | _____ | _____ |
| 5. Have facility personnel received required training by 5-19-81? | _____ | <u>X</u> | _____ | <u>No documentation</u> |
| 6. Do new personnel receive required training within six months? | _____ | <u>X</u> | _____ | <u>No documentation</u> |

B. Preparedness and Prevention
(Part 265, Subpart C)
(Part 725, Subpart C)

1. Maintenance and Operation of Facility:

- | | | | | |
|--|-------|----------|-------|-------|
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | _____ | <u>X</u> | _____ | _____ |
|--|-------|----------|-------|-------|

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

X

b. Telephone or 2-way Radios at the scene of operations?

X

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Indicate the volume of water and/or foam available for fire control

-- $\frac{1}{2}$ million gallon coolant pond

--numerous fire extinguishers

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X

b. Is emergency equipment maintained in operable condition?

X

4. Has owner/operator provided immediate access to internal alarms (if needed)?

X

5. Is there adequate aisle space for unobstructed movement?

X

C. Contingency Plan and Emergency Procedure
(Part 265, Subpart D)
(Part 725, Subpart D)

1. Does the contingency plan contain the following:

725.151 & 725.156	a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)	—	<u>X</u>	—	<u>SPCC plan does not address hazardous waste</u>
	b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37? (725.137)	—	<u>X</u>	—	_____
	c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	—	<u>X</u>	—	_____
	d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	—	<u>X</u>	—	_____
	e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	—	<u>X</u>	—	_____

2. Are copies of the Contingency Plan available at site and local emergency organizations?

X

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

X

Mr. Lane is identified, but needs documentation in Contingency Plan

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

X

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

Mr. Lane has authority, but needs documentation in Contingency Plan

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56? (725.156)

Emergency has not occurred

VI. RECORDKEEPING AND REPORTING (Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

X

All manifest have been retained to date

(B) Has the generator submitted Annual Reports and Exception Reports as required?

None required

VII. INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

X

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing? _____

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country? _____

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements? _____

VIII. Remarks

REMARKS: This facility also generates a waste oil which is shipped to a re-
cyclor. No analysis of this waste oil has been conducted to deter-
mine if it is a hazardous waste. Mr. Lane stated that he would have
an analysis performed and forward the results to the author.

A non-hazardous grinding sludge is generated at this facility
(Supplemental Permit #81-2851).

Macon Co. - General - Burn Label

New Application ☒
 Renewal ☐
 Additional Site ☐

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND/NOISE POLLUTION CONTROL SPECIAL WASTE DISPOSAL APPLICATION

FOR AGENCY USE Log # 12911

THIS APPLICATION FOR WASTE:
 Treatment ☒
 Disposal ☐
 Storage ☐

CARD TYPE DATE 10-19-81 L P S W C AUTHORIZATION NUMBER 995158 TRANS CODE A DATE ENTERED (Agency Use) 11-02-81

WASTE HAULER

HAULER REGISTRATION NUMBER 0102 NAME WASTE RESEARCH AND RECLAMATION
 ADDRESS Route 7 COMMUNITY EU CLAIRE WID 990829476
 COUNTY EU CLAIRE STATE MISSISSIPPI ZIP 54701 AREA CODE 715 TELEPHONE 834-9624

WASTE GENERATOR

GENERATOR CODE 1150150028 G NAME BORG WARNER - YORK AUTOMOTIVE DIVISION
 ADDRESS 625 S. SIDE DR. COMMUNITY DECATUR
 COUNTY MACON STATE ILLINOIS ZIP 62525 AREA CODE 217 TELEPHONE 428-4641
 GENERATOR CONTACT NAME ROBERT LANE
 DUNS NUMBER _____ SIC CODE 3585 USEPA GEN. CODE _____

PROCESS NAME DEGREASING

WASTE CHARACTERISTICS

GENERIC WASTE NAME TRICHLOROETHYLENE
 IUPAC WASTE NAME _____
 TOTAL ANNUAL WASTE VOLUME 6000 VOLUME UNITS 1 WASTE PHASE 3
 TRANSPORT FREQUENCY 6 WASTE CLASS (Agency Use) _____
 1 = ONE TIME 5 = MONTHLY 1 = CUBIC YARDS 1 = SOLID
 2 = DAILY 6 = BI-MONTHLY 2 = GALLONS 2 = SEMI-SOLID
 3 = WEEKLY 7 = QUARTERLY 3 = LIQUID 3 = LIQUID
 4 = BI-WEEKLY 8 = SEMI-ANNUALLY 4 = GAS 4 = GAS

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):

INHALATION TOXICITY _____ DERMAL TOXICITY _____ INGESTIVE TOXICITY _____ INFECTIOUS _____ REACTIVITY _____ EXPLOSIVE _____
 FLASH POINT _____ °F ALPHA RADIATION _____ (pCi/L) COMPOSITION 2
 1 = ORGANIC
 2 = INORGANIC

PERCENT ACIDITY _____ PERCENT ALKALINITY _____ pH 6.5 PERCENT TOTAL SOLIDS _____
 KEY COMPONENT NAME PERCENT KEY COMPONENT NAME PERCENT
1 TRICHLOROETHYLENE 98 2
3 TRICHLOROETHANE 02 4
5 6

RECEIVED

USEPA HAZARDOUS WASTE NO. _____ (If Hazardous)

NOV 02 1981

DEC 02 1981